

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Mary Jo A. Stoner**

**Debtor**

**PNC Bank, National Association, its successors  
and/or assigns**

**Movant**

**vs.**

**Mary Jo A. Stoner**

**Respondent**

**BK NO. 22-21064 JAD**

**Chapter 13**

**Related to Document No. 21**

**Hearing Date: 8/22/2022**

**OBJECTION OF PNC Bank, National Association , ITS SUCCESSORS AND/OR ASSIGNS  
TO CONFIRMATION OF CHAPTER 13 PLAN**

PNC Bank, National Association, objects to confirmation of Debtor's Chapter 13 Plan and asserts in support of its Objection as follows:

1. Movant's claim is secured by a mortgage on Debtor's property at 812 Brentview Drive a/k/a 812 Brentview Road Pittsburgh, PA 15236.
2. The claims bar date is August 12, 2022. Secured Creditor intends to file a claim on or before the bar date with pre-petition arrears estimated at \$12,476.98.
3. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Movant.
4. The Debtor's plan fails to address the Secured Creditor's claim. The loan modification is remote and speculative. The Debtor cannot modify the loan without the consent of the Secured Creditor. Therefore, the plan cannot be confirmed unless and until a loan modification is agreed to and approved by the Court.
5. Debtor's Plan understates the amount of the Movant's claim by \$12,476.98, and does not provide sufficient funding to pay said claim including present value interest.
6. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Movant.
7. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Movant, PNC Bank, National Association, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: August 15, 2022

By: /s/ Brian C. Nicholas, Esquire

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